

Hon. Brian A Tsuchida

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

OSCAR LEE OLIVE, IV., an individual

Plaintiff,

vs.

HAYLEY MARIE ROBINSON, an
individual,

and

JUSTUS KEPEL, an individual, and Does
1-20 inclusive

Defendants.

DEFENDANT

I, OSCAR LEE OLIVE IV, under penalty of perjury pursuant to the laws of the State of Washington, declare and states as follows:

Plaintiff's DECLARATION

- 1 -

Oscar Olive (Plaintiff) Parties
101 N. Ocean Drive Suite 132
Hollywood, FL 33019
850-319-9023

- 1 1. I am over the age of eighteen (18) and competent to testify therein. I make this
2 declaration based on my personal knowledge.
- 3 2. I am representing myself Pro Se, in the above-entitled action.
- 4 3. The information sought in the discovery is essential to provide factual support for claims of
5 Defamation against Plaintiff.
- 6 4. On Jan 29, 2019, I sent Plaintiff's First Set of Interrogatories, Admissions and Requests for
7 Production via process server to Defendant Robinson at her home address.
- 8 5. Attached hereto as Exhibit "A" is a true and correct copy of Interrogatories, Admissions
9 and Requests for Production, incorporated herein by this reference.
- 10 6. On February 26, 2019, I sent an email that asked if Defendant Robinson would have the
11 First Set of Interrogatories, Admissions and Requests for Production completed by the
12 March 1, 2019 due date. On February 27, 2019, Defendant Robinson replied by saying "she
13 would have them completed by the following week."
- 14 7. Attached hereto as Exhibit "B" is a true and correct copy of the email sent to Defendant
15 Robinson on February 26, 2019. It is also the response from Defendant Robinson February
16 27, 2019.
- 17 8. On March 3, 2019 at 11:25am I sent an additional email asking when the Defendant
18 Robinson would have the First Set of Interrogatories, Admissions and Requests for
19 Production completed as told by her in the Exhibit "B" email.
- 20 9. Attached hereto as Exhibit "C" is a true and correct copy of the email sent to Defendant
21 Robinson on March 3, 2019 asking which date the requested First Set of Interrogatories,
22 Admissions and Requests for Production will be completed by and if no reply that a CR26i
23 Plaintiff's DECLARATION

1 call would be made the following day March 5, 2019 at 12:00pm (Pacific standard time).

2 10. On March 3, 2019 at 5:27pm the Defendant Robinson replied three hours and 27 minute
3 late stating the First Set of Interrogatories, Admissions and Requests for Production would be
4 completed by Friday, March 8, 2019.

5 11. As instructed on the email Exhibit "C" I stated I would setup a CR26i phone call the next
6 day (March 5, 2019) at 12:00pm (Pacific standard time) if I did not receive a email by
7 12:00pm March 4, 2019.

8 12. At 12:04pm (Pacific standard time) March 5, 2019 I called Defendant Robinson and
9 received no answer.
10

11 13. As of March 11, 2019 I have received no reply from Defendant Robinson regarding the
12 First Set of Interrogatories, Admissions and Requests for Production that were due on
13 March 1, 2019.
14

15
16
17 Dated: March 11, 2019

Respectfully submitted,

18
19
20
21
22 By: 

Oscar Lee Olive, IV

Plaintiff, In Pro Per

Oscar.L.Olive@gmail.com

(850) 319-9023

23
24
25
26
27
28 Plaintiff's DECLARATION

- 3 -

Oscar Olive (Plaintiff) Parties
101 N. Ocean Drive Suite 132
Hollywood, FL 33019
850-319-9023

EXHIBIT “A”

Hon. Brian A Tsuchida

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

OSCAR LEE OLIVE, IV., an individual

Plaintiff,

vs.

HAYLEY MARIE ROBINSON, an
individual,

and

JUSTUS KEPEL, an individual, and Does
1-20 inclusive

Defendants.

Docket No. 2:18-cv-00862-BAT

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff Oscar Olive ("Mr. Olive") hereby serve Defendant Hayley Marie Robinson ("Ms. Robinson") a written response to these interrogatories. Ms. Robinson is hereby requested to answer these interrogatories in writing

Plaintiff's Request for Interrogatories - 1 -

Oscar Olive (Plaintiff) Parties
101 N. Ocean Drive Suite 132
Hollywood, FL 33019
850-319-9023

under oath no later than 21 days from the date of service hereof. If the answer to any interrogatory is contained in a record or document, or in other written materials in the custody, possession, or control of Defendant, Plaintiff hereby requests that, pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, a copy of each record, document or other written memorandum either be attached to the answers to these interrogatories as exhibits or be made available for inspection and copying on or before 21 days from service at the offices of Plaintiff.

DEFINITIONS AND INSTRUCTIONS

A. “Plaintiffs” means the named plaintiff Oscar Lee Olive, IV.

B. “Document” is used in the broadest sense consistent with the definition set forth in Fed. R. Civ. P. 34(a). The term “document” includes, without limitation, physical objects and things, such as research and development samples, prototype devices, production samples and the like, as well as hard copies and electronic copies of computer production software, computer files and electronic mail (email). A draft, translation or non-identical copy is a separate document within the meaning of this term.

C. The term “Profile(s)” means any online account that requires a email address to create and log into.

D. If, in responding to these interrogatories, Defendant elects to avail itself of the procedure authorized by Federal Rule of Civil Procedure 33(d), Plaintiff requests that for each interrogatory so answered, Defendant specify the particular document or documents by production number from which the answer may be derived or ascertained.

E. If Defendant does not answer any interrogatory in full, please state the precise reason for failing to do so. If a legal objection is made, please set forth the specific nature of the grounds for that objection.

F. If only a portion of any interrogatory will not be answered, please provide a complete answer to the remaining portion of the interrogatory and state the reasons or grounds for Defendant’s inability or refusal to complete the answer. If an interrogatory can be answered only in part on the basis of information available at the time of the response, please provide an answer on the basis of that information, indicate that Defendant’s answer is so limited and provide a further response when further information becomes available.

G. If Defendant learns at any time that any response to any of these interrogatories is incomplete or incorrect, Plaintiffs request that Defendant immediately serve amended responses that are complete and correct pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

H. If Defendant finds the meaning of any term in these interrogatories unclear, Defendant shall assume a reasonable meaning, state what the assumed meaning is and respond to the interrogatory according to the assumed meaning.

INTERROGATORIES

1. State your full name, present address, date and place of birth, height, and weight, and, if you have a drivers license, the state of issuance and the number of that driver's license.
2. State any other name or names by which you have been known, including. nickname(s), and the inclusive dates of use of that name or names.
3. State all your former residence addresses, including street address, city, state and zip code, that you have lived at during your lifetime, giving the dates during which you lived at each address.
4. If you are presently employed, state:
 - a. The name and address of your present employer;
 - b. The name and address of your immediate supervisor;
 - c. The nature of the work you do and your job title;
 - d. The number of hours, per week, you normally work,
 - e. The date your employment began and ended;
 - f. All of your job positions from the beginning of your employment dates for each position;
 - g. Your present rate of pay or salary; and
 - h. If you are not presently employed, describe the reason why.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

5. Where do/did you attend school?
6. What level of education do you have?
7. Did you finish High School? If not. Why not?
8. Have you ever been arrested? If so. When? Why?
9. Have you been involved in any other legal claims or lawsuits? If so. When? Where?
10. Have you discussed this lawsuit with anyone else, signed any statements or affidavits relating to this lawsuit, or posted information about this lawsuit on any Internet site or on Facebook/Instagram. If so. Who? When?
11. Was anyone else present when you discussed this case with your lawyer?
12. List all means of Social media account names, email accounts and any other internet related profiles used during the dates of July 2016 - July 2018.
13. List dates of when all Facebook accounts were created.
14. Describe in detail any and all Facebook postings and videos regarding Oscar Lee Olive IV (also known on Facebook as Lee Richardson). Specifically provide: (1) when the Facebook statement was posted (2) the content of the post in detail (3) a copy of the post (4) Names of any private Facebook groups you were a member of where you posted about Oscar Lee Olive IV (also known on Facebook as Lee Richardson).
15. Describe in detail the using of Justus Kepel's Facebook account on July 13, 2016 and any other uses for all Facebook postings and videos regarding Oscar Lee Olive (also known on Facebook as Lee Richardson). Specifically provide: (1) when the Facebook statement was posted (2) the content of the post in detail (3) a copy of the complaint if still in existence (4) Names of any private Facebook groups you were a member of where you posted about Olive.
16. Describe in detail the NCIS statement you gave to NCIS agent Jerime Thurston on Oct. 7, 2016 when you claimed Oscar Lee Olive, IV committed the serious offense of sexual assault on July, 3 2016.

- 1 17. Describe in detail why on July 3, 2016 as seen on the Plaintiffs Nest security camera
2 recording of his back porch you stated to Justus Keppel minutes after the alleged sexual
3 assault you said "This is like a dream come true" and "I'm not going to regret this".
- 4 18. Describe in detail why on July 16, 2016 on your Facebook Post regarding the posting of
5 Shutter Fun Photo on their Facebook Page you say "*I have destroyed you and will*
6 *continue to do so until you learn.*"
- 7 19. Describe in detail the night of Nov. 1, 2016 where you contact Oscar Lee Olive IV asking
8 to apologize for lying to NCIS.
- 9 20. Describe in detail the night of Nov. 2, 2016 where you posted a live Facebook Video
10 along with a written post wanting to tell everyone you were wrong and that Oscar Lee
11 Olive IV did not sexually assault Ms. Klag on the night of July 3, 2016.
- 12 21. Describe in detail the night of November 4, 2016 where you agreed to a recorded phone
13 conversation with Oscar Lee Olive IV to apologize for the false accusation.
- 14 22. Describe in detail the night of November 4, 2016 where you asked on a recorded phone
15 conversation how you can be of any help rectifying the current accusation against Oscar
16 Lee Olive IV.
- 17 23. Describe in detail all conversations to or referring to Lt. William Bateman, Capt. Anson
18 Howard and 1st Lt. Shannon Hillery regarding Oscar Lee Olive IV.

19 Dated: January 17, 2019

Respectfully submitted,

20
21
22 By: _____

23 Oscar Lee Olive, IV

24 Plaintiff, In Pro Per

25 Oscar.L.Olive@gmail.com

26 (850) 319-9023

EXHIBIT “B”

Search: irelandrosemarie@gmail.com

Interrogatories Deadline

Oscar Olive <oscar.l.olive@gmail.com> to Ireland
Tue, Feb 26, 8:20 PM (5 days ago)

Good Evening Ms. Robinson,

This is a meet and confer email to ask if you will have the responses for the interrogatories served to you on Jan 28, 2019 which are due to the Courts by Feb. 28, 2019.

If I do not receive a response to this email by 9:00pm (Pacific standard time) Feb 28, 2019 I will schedule a CR26i phone call with you the following day at 10:00am (Pacific standard time) to go over when the Interrogatories will be completed.

regards,

Oscar Lee Olive, IV

Ireland Rose to me
Wed, Feb 27, 7:51 PM (4 days ago)

I have the flu and kidney infections, I can have them done within the next week. My apologies for the late response, this sickness has been harsh.

On Tue, Feb 26, 2019, 5:20 PM Oscar Olive <oscar.l.olive@gmail.com> wrote:

Good Evening Ms. Robinson,

This is a meet and confer email to ask if you will have the responses for the interrogatories served to you on Jan 28, 2019 which are due to the Courts by Feb. 28, 2019.

If I do not receive a response to this email by 9:00pm (Pacific standard time) Feb 28, 2019 I will schedule a CR26i phone call with you the following day at 10:00am (Pacific standard time) to go over when the Interrogatories will be completed.

regards,

Oscar Lee Olive, IV

EXHIBIT “C”

irelandrosemarie@gmail.com

✕ ▾

←

📧

⚠

🗑

✉

🕒

📎

🗨

⋮

1 of about 54

⏪ ⏩ ⚙

👤

Oscar Olive <oscar.l.olive@gmail.com>

to Ireland ▾

11:25 AM (35 minutes ago)

☆ ↶ ⋮

Ms. Robinson,

This is a meet and confer email to ask if the responses for the interrogatories do plan to be completed this week, which day of the week will they be competed by?

Regards,

Oscar Lee Olive, IV

...

👤

Oscar Olive <oscar.l.olive@gmail.com>

to Ireland ▾

11:51 AM (8 minutes ago)

☆ ↶ ⋮

Ms. Robinson,

This again is a meet and confer email. I would like an answer to what date this week the requested Interrogatories will be compete by. If I do not receive a email response back by March 4, 2019 12:00pm (Pacific standard time) I will schedule a CR26i phone call on March 5, 2019 at 12:00pm (Pacific standard time).

...

Regards,

Oscar Lee Olive, IV

On Mar 3, 2019, at 11:25 AM, Oscar Olive <oscar.l.olive@gmail.com> wrote:

Ms. Robinson,

This is a meet and confer email to ask if the responses for the interrogatories do plan to be completed this week, which day of the week will they be competed by?

Regards,

Oscar Lee Olive, IV

On Feb 28, 2019, at 10:04 PM, Oscar Olive <oscar.l.olive@gmail.com> wrote:

Ms. Robinson,

Unfortunately, there is a deadline and I'm not at liberty to extend that deadline.